

CC Docket No. 94-102 – Status Report

Filed by: Keystone Wireless, L.L.C.
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Date: February 1, 2008

To: Marlene H. Dortch, Secretary
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By Electronic Submission:

Fred Campbell, Chief
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STATUS REPORT
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Keystone Wireless, L.L.C. ("Keystone") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 16927 ¶19 (2005).

Carrier Identifying Information:

Carrier Name: Keystone Wireless, L.L.C. – FRN 0007 4157 06

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Information Regarding PSAPs:

Since the submission of its last Status Report, Keystone has received one new Phase II E-911 request from the Union County PSAP. (Keystone has never received a Phase I request from the Union County PSAP.) Keystone has now received Phase I and/or Phase II requests from all nine of the PSAPs in its market. Keystone has completed installation of its Phase I deployments in eight of the nine counties in its market (*i.e.*, Berks County, Centre County, Lycoming County, Schuylkill County, Montour County, Clinton County, Northumberland County, and Snyder County), and is in the process of completing its Phase I installation in Union County.

Keystone and Essential Management Services, LLC ("EMS"), whom Keystone has retained as its liaison with the various PSAPs and with the State of Pennsylvania, continue to maintain regular contact with the PSAPs and to provide them with information on the status of Keystone's Phase II E-911 deployment. EMS continues to attend the monthly Public Safety Regional Meetings, where it discusses E-911 matters with the PSAPs on behalf of Keystone. To date, neither the Pennsylvania Emergency Management Agency ("PEMA"), which is the agency responsible for overseeing Phase I and Phase II E-911 deployment by all state PSAPs, nor any PSAP has expressed any concerns or issues with respect to Keystone's Phase II E-911 implementation efforts.

EMS also continues to work with PEMA regarding Keystone's Wireless 9-1-1 Cost Recovery Plan ("CRP"), which was initially submitted to PEMA in March of 2007. As previously reported, Keystone received notification in June 2007, that PEMA had found Keystone eligible to receive E-911 cost recovery, subject to review and revision of the CRP. At PEMA's request, Keystone, with EMS' assistance, submitted a revised CRP to PEMA in November 2007, which includes a total cost recovery for the provision of wireless Phase I E-911 service in the counties in which Keystone has deployed service. Additionally, Keystone, with EMS' assistance, is preparing another report on potential Phase II solutions for its market, which will be submitted to PEMA on or about March 1, 2008. Thus, EMS is continuing to assist Keystone with its communications with the PEMA and with keeping the PSAPs in Keystone's market apprised of Keystone's eligibility for cost recovery and the status of the PEMA funding.

Implementation of Phase II Service:

Keystone has continued to investigate various Phase II E-911 network-based solutions and to monitor the market for new products or modifications to existing products that might potentially serve as a viable and affordable Phase II solution for Keystone's market.¹ Keystone is currently in discussions with two manufacturers of network-based solutions, and has entered into nondisclosure agreements with both. One of these companies has begun conducting a study of Keystone's market to ascertain what would be the most effective network-based solution for the market, which study will take approximately two months to complete. The other company has indicated that it will begin its study of Keystone's market shortly. Keystone will incorporate these studies and the correlating expense estimate into its CRP via additional reports submitted to PEMA. PEMA will take this information into account when making a determination as to the approval of funding for Keystone's Phase II deployment. Keystone's decision as to which Phase II solution to employ is partially dependent on the amount of funding for Phase II E-911 it receives from the State of Pennsylvania. Upon receipt of any commitment of funds from the PEMA, Keystone will immediately move forward with its Phase II deployment plans. Keystone continues to explore other financing options.

Because Keystone's service area is very rural or less densely populated and the cell sites are spread far apart, only a portion of Keystone's service area is susceptible to triangulation techniques. Therefore, when Keystone implements one of the currently available network-based or hybrid Phase II E-911 solutions, which utilize triangulation techniques, it may not reach the requisite 67% and 95% accuracy

¹ Keystone also continues to monitor the trade press and attend GSM association meetings looking for any news of any manufacturer developing a GSM E-911 handset or a more viable network-based solution that would produce a better result in the areas of Keystone's market lacking adequate cell density.

requirements prescribed by §20.18(h)(1) or (2) of the Commission's rules, and likely will have to file a request with the Commission for a waiver of these accuracy standards until such time as there are further technological advancements in this field allowing for full compliance with §20.18(h) of the rules.

Construction of New Cells and Expansion of Coverage:

Since its last Status Report, Keystone has not constructed any new cell sites in its market. However, Keystone has upgraded two more of its existing cell sites in its market, such that they each now have a larger coverage area.